

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

STATE OF MAINE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
AGRICULTURE and BROOKE ROLLINS,
in Her Official Capacity as Secretary of
Agriculture,

Defendants.

No. 1:25-cv-00131-JAW

JOINT MOTION TO EXTEND TRO PURSUANT TO FED. R. CIV. P. 65(B)(2)

NOW COMES Plaintiff, the state of Maine, and Defendants, the United States Department of Agriculture and Secretary of Agriculture Brooke Rollins, and hereby jointly request that the Temporary Restraining Order entered in this matter (Dkt. #12) be extended and that the scheduling of a preliminary injunction hearing be held in abeyance pending such requested extension.

The Temporary Restraining Order was entered on April 11, 2025, and “expires at the time after entry—not to exceed 14 days—that the court sets, unless before that time the court, for good cause, extends it for a like period or the adverse party consents to a longer extension.” FED. R. CIV. P. 65(b)(2). The parties have met and conferred, and as a result of such discussions, jointly submit that extension of the Temporary Restraining Order for a “like period” (*id.*) until May 9, 2025, will assist the parties’ further discussions, conserve resources, and promote the interests of judicial economy. Defendants expressly consent to such extension, and affirm that the subject USDA funding will remain unfrozen and released during the extended period of the pendency

of the Temporary Restraining Order.

WHEREFORE, the parties jointly request that the Temporary Restraining Order be extended until May 9, 2025, and that the scheduling of a preliminary injunction hearing be held in abeyance pending such requested extension.

Dated: April 15, 2025

Respectfully submitted,

CRAIG M. WOLFF
Acting United States Attorney

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Respectfully submitted,

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Counsel for the State of Maine

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2025, I caused the foregoing to be electronically filed with Clerk of Court using the CM/ECF system, which sent such notice to any individuals and entities who have entered appearances in this case to date, pursuant to the Court's ECF system.

CRAIG M. WOLFF
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